

"William Boyd" <willlynillyboyd@wildmail.com>  
10/11/2004 04:58 PM  
To: Comments-northern-nezperce-red-river@fs.fed.us  
cc:  
Subject:

October 12, 2004

Steve Williams, Acting Forest Supervisor  
Red Pines  
Nez Perce National Forest  
Route 2 Box 475  
Grangeville, ID 83530

Dear Supervisor Williams:

The current Forest Service assault on the South Fork Clearwater very much concerns me. I recently visited this area with my wife and child camping for the weekend. I love to fish and hunt and hike and generally enjoy the beautiful places we have here in Idaho. I wonder why this area, with already degraded water quality, has been targeted for such tremendous logging activity within the past year. It would be more prudent to allow the area's water quality to improve along with the small and suffering populations of bull trout and chinook salmon.

These areas targeted, including the Crooked and American Rivers form the headwaters of the South Fork. Headwaters health determine the health of a river. Please rethink this unwise proposal. The Forest Service even admitted in the DEIS it must amend the forest plan to weaken water quality standards to allow the Red Pines proposal to go through.

We have a revision team for that kind of work. Why not let them work through that issue while you and your people work within legal means to develop logging proposals.

New roads are not needed in the South Fork. The area is chock full of roads. As to the idea that this proposal will help the fire threatened town of Elk City. This area is not adjacent to or in near proximity to Elk City. Additionally, research has shown that logging damages watersheds while fire is crucial in maintaining watershed integrity.

#### **Response 1-1 Fish**

The USFS recognizes the current condition of these watersheds. The proposed actions are designed to improve water quality and fish habitat conditions.

#### **Response 1-2 Aquatics**

The Forest Plan amendment pertaining to Fish/Water Quality Objectives has several purposes. First, it is needed in several subwatersheds to allow activities to occur concurrent with an indication of upward trend in aquatic habitat carrying capacity. This would be the case even if only the watershed restoration activities were to occur. Second, the amendment updates certain information in Forest Plan Appendix A, including establishment of objectives for the Lowest Red River subwatershed, which was not delineated at the time the Forest Plan was issued in 1987. Third, the amendment is required to allow exceedance of sediment yield guidelines, which in one case is exceeded under the current condition. Under the new Alternative E, this is the only subwatershed in which this part of the amendment applies. Finally, in the DEIS there was a proposal to suspend upward trend requirements in several subwatersheds. This part of the amendment has been eliminated under the new Alternative E. Depending on the alternative, only certain parts of the amendment could be construed as "weakening" water quality standards. This effect is the least in Alternative E and is indeed needed to allow certain watershed improvement actions to proceed.

**Response 1-2a. Amendments.** Yes, the forest plan revision team is working on issues related to water quality and is schedule to be completed by the end of 2006. However, it is legal to amend the current forest plan, following a complete environmental review (36 CFR 219; 2004). See Section 2.3.3.3 and Appendix D for specific amendments proposed with the Red Pines project.

#### **Response 1-3 New roads.**

An alternative to use existing roads and helicopter yarding was considered but eliminated from further study as described in the FEIS, Section 2.3.1. All action alternatives proposed to decommission 86 to 104 miles of roads that have impacted watershed integrity (See Table II-2 of the FEIS).

I urge you to alter this proposal to eliminate any ill effects the South Fork will sustain. If that means eliminating the entire proposal, please do so. Thanks for your time.

Sincerely,  
Will Boyd  
328 East 2nd St  
Moscow, ID 8384

**Response 1-4** Management, upward trend. The USFS recognizes the below-objective conditions of these watersheds. The aquatic trend analysis in Appendix H of the FEIS is the documentation leading to the conclusion that an upward trend in aquatic condition is predicted in the long term for many subwatersheds under Alternatives B, C and D and for all subwatersheds under Alternative E. This analysis takes into account the positive and negative effects of the project activities in the short and long term. A detailed upward trend analysis for each subwatershed is located in the Red Pines Analysis file.